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Attorney for Defendants CITY OF ROCKLIN and DAVID
MOHLENBROK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA - SACRAMENTO

RU HOGAN,

Plaintiff,

v.

CITY OF ROCKLIN, DAVID
MOHLENBROK, and DOES 1
THROUGH 100,

Respondent.

Case No.: 2:24-cv-03566-JAM-SCR

Complaint Filed: 11/1/2023
FAC Filed: 1/16/2025

**DECLARATION OF LARS T. REED IN
SUPPORT OF DEFENDANT DAVID
MOHLENBROK'S MOTION FOR
ATTORNEYS' FEES**

I, Lars T. Reed, declare and state as follows:

1. I am an attorney at law duly licensed to practice law in California and permitted to practice in the Eastern District of California (State Bar No. 318807). I have personal knowledge of each matter stated herein, and if called upon to do so, could and would competently testify to each matter set forth herein.

2. I have an Of Counsel relationship with the law firm Liebert Cassidy Whitmore ("LCW"), counsel of record for Defendant City of Rocklin ("Defendant" or "City") and for former defendant David Mohlenbrok ("Mohlenbrok", and collectively with the City, the "Defendants"). I have regularly assisted Nathan Jackson, a partner at LCW's Sacramento office, on litigation related to this matter.

3. I have been working with LCW since the fall of 2018, after completing a judicial clerkship with the Supreme Court of Alaska. My legal practice with LCW has been nearly

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1 exclusively focused on labor and employment law, municipal law, and related litigation.

2 4. Working with Mr. Jackson, I prepared a special motion to strike (the “Anti-SLAPP
3 Motion”) on behalf of both Defendants, seeking to strike all state law claims from Plaintiff Ru
4 Hogan’s Complaint on the grounds that these claims arise from conduct protected by
5 California’s anti-SLAPP law and that Plaintiff cannot demonstrate a likelihood of prevailing.

6 5. In total, I have spent 36.6 hours in connection with Defendants’ Anti-SLAPP
7 Motion. This includes: 5.2 hours reviewing Plaintiff’s Complaint and evidence on record to
8 identify legal grounds for the Motion and assessing their merits; 6.8 hours researching case
9 law concerning the legal standards governing anti-SLAPP motions filed under California law
10 in federal court and outlining potential legal arguments supporting the Motion; 0.8 hours
11 preparing a detailed summary of Defendants’ motion as part of Defendants’ efforts to “meet
12 and confer” with opposing counsel; 11.1 hours drafting the Anti-SLAPP Motion; 3.2 hours
13 drafting supporting documentation including sworn witness declarations; and 9.5 hours for
14 research, analysis, and drafting in connection with Mohlenbrok’s request for attorney’s fees.


15 6. In my professional opinion, based on my experience, the amount of time expended
16 was reasonable and necessary to zealously advocate Defendants’ position in response to the
17 claims asserted against them.

18 7. LCW billed Defendants for my time spent on this matter as outlined above at a rate
19 of \$290 per hour. In my professional opinion, this rate is reasonable and in line with attorneys
20 in Northern California with a comparable level of experience.

21 8. In total, Defendants incurred \$10,614 (36.6 hours × \$290 per hour = \$10,614) in
22 attorney’s fees for my time spent preparing the Anti-SLAPP Motion, in addition to any fees
23 incurred for Mr. Jackson’s time.

24 I declare under penalty of perjury under the laws of the United States and the State of
25 California that the foregoing is true and correct.

26 Executed on January 31, 2025, in Asker, Norway.

27 
28 Lars T. Reed